

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BECKMAN COULTER, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 24-945 (CFC) (EGT)
	)	
CYTEK BIOSCIENCES, INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND [PROPOSED] ORDER PERMITTING DEFENDANT  
LEAVE TO SERVE SUPPLEMENTAL INVALIDITY CONTENTIONS**

WHEREAS, pursuant to the parties' stipulation (D.I. 205), Plaintiff Beckman Coulter, Inc. ("Beckman Coulter") served its Second Amended Disclosure of Asserted Claims and Infringement Contentions on November 19, 2025 (D.I. 206);

WHEREAS, pursuant to the parties' stipulation (D.I. 205), the parties have conferred and Defendant Cytek Biosciences, Inc. ("Cytek") now seeks leave to serve its Corrected Supplemental Initial Invalidity Contentions and Corrected Election of Asserted Prior Art Grounds, which address only the presently asserted claims and third-party documents accessible after Cytek served its revised invalidity contentions on July 11, 2025;

WHEREAS, on November 25, 2025, Cytek served Beckman Coulter with its proposed Corrected Supplemental Initial Invalidity Contentions and Corrected Election of Asserted Prior Art Grounds;

WHEREAS, Cytek asserts that good cause exists for Cytek to serve its Corrected Supplemental Initial Invalidity Contentions and Corrected Election of Asserted Prior Art Grounds, and Beckman Coulter does not oppose<sup>1</sup>;

NOW, THEREFORE, IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that Cytek may serve its November 25, 2025, Corrected Supplemental Initial Invalidity Contentions and Corrected Election of Asserted Prior Art Grounds.

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<sup>1</sup> While Beckman Coulter does not oppose the instant motion, Beckman Coulter disputes that Cytek's Corrected Supplemental Initial Invalidity Contentions and Corrected Election of Asserted Prior Art Grounds comply with the Court's September 29, 2025 Scheduling Order (D.I. 177) requiring Cytek to narrow the number of prior art invalidity grounds to no more than five per claim, including because both the "Luminex System" and "Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors" cited in Cytek's proposed amended contentions constitute several distinct systems, and as such any Ground including these references constitutes multiple distinct combinations. Beckman Coulter reserves all rights with respect to Cytek's failure to comply with the Court's September 29, 2025 Scheduling Order (D.I. 177).

RICHARDS, LAYTON & FINGER P.A.

*/s/ Christine D. Haynes*

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December 16, 2025

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*Attorneys for Defendant  
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SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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CHIEF, UNITED STATES DISTRICT JUDGE